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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation;
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KYANNA SABANOGLU IN
SUPPORT OF UNOPPOSED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL JOINT
DISCOVERY LETTER BRIEF AND EXHIBITS**

I, Kyanna Sabanoglu, hereby declare:

1. I am Associate General Counsel, IP Litigation for Defendant, Meta Platforms, Inc. (“Meta”). I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta’s administrative motion to file under seal portions of documents relating to the Parties’ Joint Discovery Letter regarding Meta’s search terms (“Joint Letter Brief”). The motion seeks to have the following partially sealed:

Document	Sealing Request
Joint Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit A to Joint Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit B to Joint Letter Brief	<ul style="list-style-type: none"> Redacted portions

3. The redacted portions of the Joint Letter Brief refer to Meta’s highly sensitive, confidential practices and processes surrounding its Llama models and the datasets used to train the Llama models. The information in the redacted portions is based on and quotes from documents produced by Meta designated “Highly Confidential – Attorneys’ Eyes Only” and “Confidential” under the Stipulated Protective Order. Public disclosure of the information contained in these portions exposes Meta to the risk of competitive harm.

4. The redacted portions of Exhibits A and B to the Joint Letter Brief include search terms based on confidential documents and testimony produced and provided in this litigation. These search terms reflect Meta’s highly sensitive business strategies and partnerships – including names of third-parties that are subject to non-disclosure agreements – and highly sensitive information concerning confidential practices and processes surrounding Meta’s Llama models and the datasets used to train them.

5. Public disclosure of the redacted information in the documents above exposes Meta to the risk of competitive harm by revealing Meta’s non-public information pertaining to the development of its generative AI offerings and business practices. Meta takes steps to carefully protect the confidentiality of information of this sort.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct

3 Executed in New York, New York on this 9th day of December, 2024.
4

5 
6 Kyanna Sabanoglu

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